

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

No. 20 Civ. 7311 (LAK)

**NOTICE OF PLAINTIFF E. JEAN CARROLL'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that Plaintiff E. Jean Carroll hereby moves this Court, before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date to be set by the Court, for an order: (1) declaring the specific issues enumerated in section I.B of Carroll's memorandum of law to be subject to the doctrine of preclusion in *Carroll I* based on the jury trial verdict in *Carroll II*; and (2) granting partial summary judgment to Carroll on her defamation claim in this action as set forth in section II of her memorandum of law.

This motion is supported by the annexed memorandum of law, Plaintiff's statement of undisputed material facts pursuant to Local Civil Rule 56.1, and the declaration of Roberta A. Kaplan and accompanying exhibits.

Dated: New York, New York
August 2, 2023

Respectfully submitted,



Roberta A. Kaplan
Michael Ferrara
Shawn G. Crowley
Trevor W. Morrison (admitted *pro hac vice*)
Matthew J. Craig
Kaplan Hecker & Fink LLP
350 Fifth Avenue, 63rd Floor
New York, New York 10118
Telephone: (212) 763-0883
Fax: (212) 564-0883
rkaplan@kaplanhecker.com
mferrara@kaplanhecker.com
scrowley@kaplanhecker.com
tmorrison@kaplanhecker.com
mcraig@kaplanhecker.com

Joshua Matz
Kaplan Hecker & Fink LLP
1050 K Street NW, Suite 1040
Washington, DC 20001
Telephone: (212) 763-0883
Fax: (212) 564-0883
jmatz@kaplanhecker.com

Counsel for Plaintiff E. Jean Carroll